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10 Attorneys for Plaintiff STEFFON BARBER

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14

15 STEFFON BARBER, an individual,

16
17 Plaintiff,

18 vs.

19 COUNTY OF SAN BERNARDINO, et
20 al.,

21 Defendants.
22

Case No. 5:22-cv-00625-KK-DTB

DISCOVERY MATTER

Assigned to:

Hon. District Judge Kenly Kiya Kato
Hon. Magistrate Judge, David T. Bristow

**JOINT STIPULATION AND
REQUEST FOR A COURT ORDER
ALLOWING PLAINTIFF'S
EXPERTS TO EVALUATE HIM IN
CUSTODY**

[Proposed] Order *filed concurrently
herewith*

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24
25
26 **TO THE HONORABLE COURT:**

27 IT IS HEREBY STIPULATED by and between Plaintiff STEFFON
28 BARBER, and the Defendants COUNTY SAN BERNARDINO and DEPUTY

1 CHRISTOPHER ALFRED (collectively, “Defendants”) the parties, through their
2 respective attorneys of record, as follows:

- 3 1. The Parties hereby request that this Court issue an order permitting
4 Plaintiff’s medical experts to evaluate him at the facility where he is
5 currently in custody.
- 6 2. This case arises from the shooting of Steffon Barber by Defendant Deputy
7 Christopher Alfred, which occurred on April 27, 2021. During the
8 incident giving rise to this lawsuit, Mr. Barber sustained gunshot wounds
9 to the back of his head and related injuries.
- 10 3. Plaintiff and Defendants intend to retain medical experts to opine on his
11 physical injuries relating to the deputy-involved shooting. Plaintiff’s
12 experts intend to base their opinions in part on their in-person physical
13 examination of Mr. Barber.
- 14 4. Plaintiff Steffon Barber is currently a state prisoner (CDCR #CB5634).
15 Plaintiff previously filed a request for a court order allowing his medical
16 expert(s) to evaluate him where he was housed at Wasco State Prison
17 (“WSP”), located at 701 Scofield Ave., Wasco, California 93280.
- 18 5. Mr. Barber was recently transferred to Salinas Valley State Prison
19 (“SVSP”), located at 31625 Highway 101, Soledad, CA 93960, which is
20 operated by the California Department of Corrections and Rehabilitation
21 (“CDCR”). SVSP/CDCR requires a court order for Plaintiff’s expert(s) to
22 conduct an in-person examination of Mr. Barber.
- 23 6. The Parties agree that Defendants’ expert(s) may appear at the medical
24 examination(s) of Plaintiff by Zoom and/or that the examination(s) be
25 video-recorded, provided that SVSP/CDCR is able to accommodate this
26 request.
- 27 7. Accordingly, the Parties request that this Court issue an Order permitting
28 the in-custody evaluation of Plaintiff to proceed at a date and time that is

1 mutually convenient for the expert(s) and the SVSP/CDCR.

2
3 DATED: September 16, 2025

LAW OFFICES OF DALE K. GALIPO

4
5 By:



6 Dale K. Galipo
7 Renee V. Masongsong
8 Attorneys for Plaintiff

9 DATED: September 16, 2025

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

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11 By: Kayleigh A. Andersen

12 Eugene P. Ramirez, Esq.
13 Kayleigh A. Andersen, Esq.
14 Attorneys for Defendant,
15 COUNTY OF SAN BERNARDINO

16 DATED: September 16, 2025

**IVIE McNEILL WYATT PURCELL &
DIGGS**

17
18 By: /s/ Rodney S. Diggs

19 Rodney S. Diggs, Esq.
20 Attorneys for Plaintiff, STEFFON
21 BARBER